



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 19, 2021

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BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Ronald Goland & Isaiah Smith*, S1 21 Cr. 78 (KMW)

Dear Judge Wood:

The Government writes, on behalf of the parties, in advance of the conference scheduled in this matter for April 28, 2021, at noon. In short, the parties submit that an adjournment of approximately 60 days would be appropriate. If the Court agrees, the Government requests (with the consent of defense counsel) that the Court exclude time under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference.

The Government has made its initial production of Rule 16 material to both defendants, but its production of discovery will continue on a rolling basis. Last week, on April 13, 2021, the Government requested that defense counsel provide thumb drives to the Government so that it can provide copies of a second batch of Rule 16 discovery, which is fairly voluminous. Accordingly, the defense will require time to continue its review of discovery. Additionally, the capital case process with respect to Mr. Goland remains ongoing. For all these reasons, the parties agree that a 60-day adjournment would be appropriate.

If the Court agrees, the Government respectfully requests that the Court exclude time, pursuant to 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference. The Government submits that the ends of justice served by an exclusion of time outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow for the defendants'

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continued review of the voluminous discovery in this case. In addition, such an exclusion will help ensure the effective assistance of counsel and help avoid any possible miscarriage of justice. Counsel for both defendants consent to the request.

The conference is adjourned
to June 29, 2021, at 10:30 a.m.
Time is excluded, pursuant to
18 USC 3161(h)(7)(A), to
June 29, 2021

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By:

Justin V. Rodriguez
Justin V. Rodriguez
Assistant United States Attorney
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cc: Counsel of record (by ECF)

SO ORDERED: N.Y., N.Y.

Kimba M. Wood

4/20/21

KIMBA M. WOOD
U.S.D.J.